

REMARKS

Claims 1-22 are pending in the Application.

Claims 1-3 have been cancelled.

Claims 23-27 have been added.

I. REJECTIONS UNDER 35 U.S.C. § 102

Claims 1-17 and 21 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Klimczak et al.* (U.S. Patent No. 6,513,111). In response, Applicants respectfully traverse this rejection. As the Examiner is well aware, for a claim to be anticipated under § 102, each and every element of the claim must be found within the cited prior art reference. Since claims 1-3 have been cancelled, the rejections of these claims are moot.

The present invention discloses and claims an invention whereby all of the control objects can be removed from being displayed, at the user's option. In such an instance, there are then no control objects displayed to permit the user to manipulate any of the content object. When this occurs, the user is given a hardware input to again display the control objects; otherwise, the user would be unable to manipulate the content.

With respect to claim 4, the Examiner's rejection has ignored the specific language within this claim that recites that the content object is displayed without any control GUI objects. *Klimczak* does not teach or suggest that action items values can be set so that there are no control objects displayed with the application. A subscriber can give its users access to move more or fewer user interface features. This does not teach that all such features are removed. Moreover, *Klimczak* clearly teaches away from the claims by stating that configurable "action items" do not include access to data or databases, etc. in column 1, line 57-62.

With respect to claim 7, the Examiner has merely asserted that claim 7 is similar in scope to claim 16 and therefore rejected under a similar rationale. With respect to the control GUI objects being saved in an excess content object, as recited in claim 7, the

Examiner merely asserts that “*Klimczak* indirectly shows that GUI object (sic) can be stored into an excess content object because *Klimczak*’s physical mediums for storing information are in many different forms throughout the network.” The Examiner has cited language in support of such an assertion in columns 2-4, as indicated on page 5 of Paper No. 2. However, these recitations within *Klimczak* merely disclose that the data processing system on which the *Klimczak* invention is implemented employs memory for storing data. Nowhere within *Klimczak* is it taught or suggested that there is an excess content object set up within the software and that excess content to be covered by the control GUI objects may be saved in such an excess content object when the control GUI objects are added to the screen object. Claim 8 is patentable over *Klimczak* as not being anticipated for reasons similarly as given with respect to claim 7. Since the Examiner’s burden for proving a case of anticipation is that each and every limitation must be found within the cited prior art reference, the Examiner has failed to prove a *prima facie* case of anticipation by merely asserting that *Klimczak* indirectly shows such limitation.

Claims 9-12 are patentable for the same reasons as given above with respect to claims 4-8.

Claims 13-16 are patentable for the same reasons as given above with respect to claims 4-12.

Claim 17 recites that the conventional screen could be displayed as opposed to the unconventional screen without any control GUIs by receipt of a user selection of a hardware button on the system. The Examiner has failed to prove a *prima facie* case of anticipation in rejecting this claim by merely asserting language cited in *Klimczak* at column 12, lines 20-29. All this language teaches is that a mouse button or keyboard key could be programmed to perform an action item. Thus, a keyboard key could be programmed by the subscribers to perform a specific function when pressed by the user. Since in *Klimczak* the subscriber is determining what action items to display, it does not make sense to program a keyboard key to permit a user to do the same. The difference in the present invention is that a keyboard key can be configured to permit the user to select whether some (or all) or none of the control objects are displayed. *Klimczak* does

not teach or suggest that a user can toggle between a conventional screen showing control GUIs and an unconventional screen showing no control GUIs. The Examiner's rejection relies upon assumptions and is not supported with teachings in *Klimczak* that actually disclose the limitations. Claim 18 is patentable over the cited prior art for the same reasons as given above with respect to claim 17.

## II. REJECTIONS UNDER 35 U.S.C. § 103

Claims 18-20 and 22 stand rejected under 35 U.S.C. § 103 as being unpatentable over *Klimczak* in view of *Ditzik* (U.S. Patent No. 6,064,373). In response, Applicants respectfully traverse these rejections.

All *Ditzik* teaches is a desktop computer with an adjustable flat panel screen. There is no motivation to combine *Ditzik* with *Klimczak* except for the Examiner's unsupported opinion that it would have been obvious at the time of the invention for a person with ordinary skill in the art to use a PDA or other handheld devices in *Klimczak*'s application to provide a portable mobile display tablet operation to the user. This is insufficient to support a *prima facie* case of obviousness, since it is solely the Examiner's subjective opinion that is supporting such a motivation to combine the references.

Furthermore, Applicants provide on pages 1 and 2 the reason that such portable devices need an invention as recited within the present claims, since there is limited display real estate for showing the content, and control GUIs will take up such valuable real estate. The present invention provides a unique advantage in that it permits a user to press a hardware button or use their stylist pen to toggle the content being displayed on such a device between a state where only the content is displayed to the user without any control GUIs to manipulate such a content, and one where the GUI objects are displayed. The desktop applications cited in both *Klimczak* and *Ditzik* do not provide a motivation to display content without control GUIs, since both of these inventions are disclosed to be utilized with desktop systems and accompanying larger displays where the need to conserve such display real estate is not necessary. In other words, one skilled in the art at the time the invention was made would have looked at *Klimczak* and *Ditzik*,

and would not have been motivated to program these systems to remove all control GUIs from being displayed, since there is ample space on the display to show such control GUIs.

### III. NEW CLAIMS

New claims 23-25 are patentable over the cited prior art, since they recite limitations not taught or suggested by either of the prior art patents or combination thereof.

The prior art does not teach that all control GUI objects can be removed from the display thus providing the user no way of manipulating the content object.

The prior art does not teach or suggest a hardware input that permits the user to display previously undisplayed control GUI objects, as in claim 25.

The prior art teaches away from claim 26, as indicated above in Section I.

IV. CONCLUSION

As a result of the foregoing, Applicants respectfully assert that the present invention is patentable over the cited prior art and requests an early allowance of the claims.

Respectfully submitted,

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